

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HISHAM MUTAN

Defendants.

No. 4:17-CR0234 RLW/DDN

MOTION TO AMEND BOND CONDITIONS

Come now the Defendants, Hisham Mutan, Mohammed Almuttan, Rami Almuttan, and Saddam Mutan, by and through their attorneys and respectfully request the Court to amend the bond conditions that have been entered in this matter. In support thereof, the Defendants state as follows:

1. The Defendants are being unnecessarily restricted in their movements for legitimate business purposes.

2. Pre-Trial Release does not understand the requirements of operating the Defendants' businesses. They have purposely frustrated the Defendants in their movements for legitimate business purposes.

3. The Defendants in this matter operate nine legitimate businesses in the City of St. Louis and in St. Louis County. Each of these businesses has legitimate mercantile requirements including: operating ATMs, making bank deposits, overseeing activities within the various business locations, and other business related activities. Due to sheer size and volume of the Defendant's businesses, there is a necessity for the four

Defendants to move among the various businesses. This includes movement to banks and vendors, all in the legitimate exercise of their business.

Wherefore, the Defendants request that the Court amend the conditions of their monitored release to allow them movement among their various stores and business entities, and for such other and further orders that the Court deems just in the premises.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of July, 2017, the foregoing **Motion to Amend Bond Conditions** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager